

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

XIAOTIAN LIU

Plaintiff,

v.

KRISTI NOEM, in her official capacity, et al.,

Defendants.

Case No.

DECLARATION OF ATTORNEY SANGYEOP KIM

I, SangYeob Kim, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I submit this declaration in support of Plaintiff's Motion for Temporary Restraining Order.
2. I am over eighteen years of age and am competent to make this Declaration.
3. I am an attorney with the American Civil Liberties Union of New Hampshire.
4. I am one of the counsel representing Plaintiff in the instant case.
5. Attached hereto as exhibits are true and correct copies of the following.

Exhibit Documents

- A. Affidavit of Xiaotian Liu.
- B. Email from Plaintiff's School.
- C. Plaintiff's LinkedIn Public Profile.
- D. Plaintiff's Published Article.
- E. ICE Policy Guidance 1004-04 – Visa Revocations.
- F. Guidance Directive 2016-03 9 FAM 403.11-3 – Visa Revocation.
- G. NHPR News Article.

H. CBS8 News Article.

I. Boston.com News Article.

J. Affidavit of Attorney Stephanie Elona Young Marzouk.

I declare under penalty of perjury that the foregoing is true and correct.

/s/SangYeob Kim

SangYeob Kim

Executed on April 7, 2025.